

**Before the**  
**Federal Communications Commission**  
**Washington, DC 20554**

In the Matter of	)	IB Docket No. 11-109
Ligado's Modification Application	)	IB Docket No. 12-340

**REPLY COMMENTS OF**  
**TOPCON POSITIONING SYSTEMS, INC.**

Topcon Positioning Systems, Inc. ("Topcon"), through counsel and pursuant to 47 C.F.R. § 1.415(c), files these Reply Comments in response to the Public Notice issued on April 22, 2016 (DA 16-442).

As Topcon noted in its opening comments,<sup>1</sup> the testing conducted by Roberson and Associates (RAA) on behalf of Ligado demonstrated that all three of the Topcon devices tested "show an impact from Ligado's proposed operations [ ] in the 1526-1536 MHz band."<sup>2</sup> As a result of those tests, Topcon and Ligado agreed to engage in additional testing to permit Topcon to better evaluate the potential impacts of Ligado's proposed license modifications, as well as potential mitigation efforts that could be implemented.

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<sup>1</sup> Comments of Topcon Positioning Systems, Inc., IB Docket Nos. 11-109 and 12-340 (May 23, 2016).

<sup>2</sup> Letter from Gerard J. Waldron, Covington & Burling, Counsel to Ligado, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 11-109; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091 (filed May 11, 2016) (Ligado May 11, 2016 *Ex Parte*), Tab 1, Letter from Covington & Burling Regarding *Ex Parte* Presentation, at 4 (May 9, 2016); *see also* Ligado May 11, 2016 *Ex Parte*, Tab 2, Roberson & Associates, *Results of GPS and Adjacent Band Co-Existence Study*, at 13 ("The remaining manufacturer — Topcon — offers devices that show an impact from Ligado's proposed operations only in the 1526-1536 MHz band. Three devices are in this category."); Ligado May 11, 2016 *Ex Parte*, Tab 3, Roberson & Associates, *GPS and Adjacent Band Co-Existence Study: Summary of Methods and Results*, at 24, 31-44, and 59-65.

While that testing is currently underway, it has not yet been completed and the results are not yet known. Accordingly, Topcon does not yet know whether mitigation efforts can be implemented to fully address the interference that Ligado's proposed network would cause.

Topcon and Ligado are continuing to work to complete testing and will soon be in a better position to explore efforts that Ligado can take to address Topcon's concerns. Topcon currently anticipates that this process will require an additional 45 – 60 days. Topcon will update the Commission when that process is completed.

Dated: June 20, 2016

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